

Eli Richardson

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

TENNESSEE CONFERENCE of the NATIONAL
ASSOCIATION for the ADVANCEMENT of
COLORED PEOPLE, on behalf of itself and its
members, et al.,

Plaintiffs,

v.

WILLIAM LEE, in his official capacity as Governor of
the State of Tennessee, et al.,

Defendants.

Civil No. 3:20-cv-01039

JUDGE RICHARDSON
MAGISTRATE JUDGE
FRENSLEY

[Putative Class Action]

MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS AS TO PLAINTIFF LEOLA SCOTT

Plaintiffs respectfully move this Court for leave to file a sur-reply to address Defendants' contention that Plaintiff Scott "has no claim" because she has been issued a "proper" Certificate of Voting Rights Restoration (COR). Defs.' Reply, Doc. 324 at PageID#8108-09. The proposed sur-reply, attached hereto as **Exhibit A**, clarifies the scope of Ms. Scott's personal interest in the case following Defendant Goins' recent recognition that she is no longer disqualified from voting due to a felony conviction. And it emphasizes that even if Ms. Scott's personal interest has expired, her claims on behalf of the putative class remain live under multiple exceptions to the mootness doctrine, as explained in Plaintiffs' response brief, Doc. 317 at PageID#87-91.

Dated: December 9, 2024

Respectfully submitted,

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/s/ Blair Bowie
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